



EASTERN RESEARCH GROUP, INC.

MEMORANDUM

TO: Rick Crume, U.S. Environmental Protection Agency (EPA),
Office of Air Quality Planning Standards (OAQPS), (MD-13)

FROM: Susan Radomski, Eastern Research Group (ERG), Morrisville

DATE: July 22, 1998

SUBJECT: Summary of the June 19, 1998 Teleconference of the Industrial Combustion
Coordinated Rulemaking (ICCR) Incinerator Work Group (IWG)

1.0 INTRODUCTION

- The primary purpose of the meeting was to discuss any comments IWG members had on the most recent version of the Regulatory Alternatives Paper (RAP). Comments from the Boiler Work Group (BWG) were also heard.
- The meeting was held on June 19, 1998 as a teleconference.
- A list of meeting attendees with their affiliations is included as attachment 1.

2.0 SUMMARY OF DISCUSSION AND DECISIONS

The meeting discussion generally followed the agenda. Topics of conversation are summarized in the following sections:

- 2.1 Announcements
- 2.2 IWG Comments on the RAP
- 2.3 BWG Comments on the RAP
- 2.4 Action Items

2.1 Announcements

- Rick Creme discussed the calendar of upcoming IWG events. A new version of the RAP will be posted by June 26, in time for the July 7 IWG meeting in Pittsburgh.
- Rick Creme discussed the details of the July 7 IWG meeting. The meeting will be held at the Pittsburgh Airport and is scheduled to begin at 9:30 a.m. and end at 4:00 p.m. The agenda will include further discussion of the RAP and recommendations for emission testing.

2.2 IWG Comments on the RAP

- Dick Van Frank of The National Audubon Society opened discussion about the RAP by inquiring about the inclusion of industrial waste incinerators and how they may be subcategorized before the Work Group receives the definition of solid waste from EPA. Norm Morrow of Exxon Chemical Americas replied that the subgroups have identified most of the industrial wastes found in the ICCR databases as belonging to one of the current subcategories. However, about 50 of the wastes remain unidentified. Mr. Morrow suggested that the applicability definitions will specify the wastes that are not covered by using such terms as, "...all industrial waste not otherwise identified."
- Mr. Van Frank also pointed out some topics which were not adequately explained in the current version of the RAP. Norm Morrow suggested that he and Mr. Van Frank draft a few paragraphs explaining the topics more fully and submit them for addition to the next RAP version.
- Andy Roth of the Ohio Regional Air Pollution Control Agency discussed the Pollution Prevention section of the RAP and the inability of some operators to control the parameters mentioned therein. Norm Morrow responded that the Pollution Prevention guidance may be followed by the unit designer as well as the owner or operator. Mr. Roth also suggested that, when the RAP language specifies numeric emission limits, guidance on design standards is unnecessary. Jon Devine of EPA agreed.
- Mr. Roth also questioned the criteria of the operator training and qualification exams specified in the RAP. Mr. Morrow suggested that people with questions about operator training review the Medical Waste MACT for examples of what criteria the tests must meet. Rick Creme reiterated the fact that the RAP is only to be used as guidance.

2.3 BWG Comments on the RAP

- Roy Oommen of Eastern Research Group outlined the comments made by a task group of BWG members who reviewed the RAP. The BWG recommended the addition of a cover letter outlining the major issues raised by the RAP. They also produced a mark up of the actual RAP wording showing their suggestions. Among these suggestions were comments on the definition of biomass, which includes wood and wood waste. The latest EPA staff version of the solid waste definition considers biomass to be a fuel in most cases. The BWG also recommended further distinction between boiler and incinerator units.
- The BWG expects to provide an unofficial copy of their RAP comments on June 29. They plan to complete an official copy around July 3.

2.4 Action Items

- Dick Van Frank and Norm Morrow will draft a few paragraphs to be added to the next version of the RAP in order to further explain topics which are not fully addressed in the current version.
- Rick Creme will look into the status of the material data collection and testing task being completed by the BWG and report back to the IWG.

3.0 UPCOMING MEETINGS

- June 24: Subteam 2 meeting in Research Triangle Park, North Carolina.
- July 7: IWG meeting at the Pittsburgh Airport.
- August 4: IWG teleconference. 10:00 a.m., EDT

ICCR INCINERATOR WORK GROUP TELECONFERENCE
June 19, 1998

Activities and Decisions

- Rick Crume of EPA outlined the milestones for the upcoming weeks. A new version of the RAP needs to be posted by June 26 for the July 7 Incinerator Work Group (IWG) Meeting.
- The IWG discussed their comments on the RAP. For each topic requiring revisions to the RAP, a person was chosen to write up the changes and get them to Rick Crume for inclusion in the next RAP version.
- Roy Oommen of Eastern Research Group outlined the major issues in the RAP upon which the Boiler Work Group (BWG) will comment. An unofficial copy of the comments can be provided to the IWG on June 29. The BWG expects to complete an official copy around July 3.

Upcoming Meetings

- The current Work Group meeting schedule is as follows:
 - June 24: Subteam 2 meeting at Glaxo Wellcome in Research Triangle Park.
 - July 7: IWG meeting at the Pittsburgh airport.
 - August 4: IWG teleconference

Action Items

- Dick Van Frank of the National Audubon Society and Norm Morrow of Exxon Chemicals America will draft a few paragraphs to be added to the next version of the RAP in order to explain topics which are not fully addressed in the current version.
- Rick Crume will look into the status of the material data collection and testing task being conducted by the BWG and report their progress to the IWG.

ATTACHMENT 1
MEETING PARTICIPANTS

Meeting Participants

Name	Affiliation
Ethan Begg	Missouri Department of Natural Resources
Rick Creme	U.S. EPA/OAQPS
Jon Devine	U.S. EPA/OGC
Dave Maddox	Stanley Furniture Company
Dennis Marietta	La-Z-Boy Incorporated
Norman Morrow	Exxon Chemical Americas
Roy Oommen	Eastern Research Group, Inc.
Bill Perdue	Pulaski Furniture Corporation
Susan Radomski	Eastern Research Group, Inc.
Andrew Roth	Regional Air Pollution Control Agency (Ohio)
Chris Sarsony	Eastern Research Group, Inc.
Dick Van Frank	National Audubon Society
Tom Waddell	Eastern Research Group, Inc.
Ed Wheless	Los Angeles County Sanitation District